REMARKS

Reconsideration of the application is respectfully requested.

The application is directed to a water soluble package containing a detergent composition. The packaging and transport of water soluble packages containing fluid substances subjects the formed packages to considerable impact forces. A particular problem is that when a number of such packages are loose packed in a larger container which is then transported, the impact forces suffered by the packages within the container can be severe. The difficulty is that in such a situation it only takes one package in the larger container to break for the whole product to be ruined as far as the consumer is concerned because the fluid contents of the broken package may leak over any unbroken packages. Consumer confidence in a product is likely to be badly damaged by such an occurrence. The problem of minimising breakage to an acceptable level is particularly acute in the area of laundry detergents and other domestic consumer products and has not been solved until now. See page 2, line 24 - page 3, line 4 of the specification.

Applicants have surprisingly discovered that the above mentioned problems and disadvantages of known water soluble packages are substantially addressed by the packages according to the invention. In particular, the invention yields water soluble packages which are sufficiently robust to withstand (to a commercially acceptable level) the rigours of packaging and transport even when the fluid substance inside the package is a domestic consumer product such as a laundry detergent. The combination of thermoforming the packages of the invention and forming the packages into a dome shape confers surprising advantages on the packages of the invention. See page 3, line 26 - page 4, line 3 of the specification.

Claims 1 - 10 were rejected under 35 U.S.C. §103(a) as being unpatentable over Ciallella et al. (U.S. Patent 4,806,261) in view of Chan (U.S. Patent 5,996,845).

Applicants respectfully traverse the rejection. It is not seen how one of ordinary skilled in the art would have been led to combine Ciallella with Chan since employing the package of Chan in Ciallella's invention would destroy the purposes of both Chan and Ciallella:

- Ciallella needs water soluble package, whereas Chan teaches water insoluble packages;
- Ciallella teaches granular detergent within the package, whereas Chan teaches liquid composition;
- Chan discloses a liquid dispensing package which is not entirely sealed around the perimeter of the package but, rather, contains an opening, for squeezing the liquid contents out of the package; whereas Ciallella's package is sealed.

The problems identified in Chan (objectives of invention, problems with prior art) don't extend to minimising breakages of the article because water insoluble material is generally tougher. The lack of susceptibility of water-insoluble film material means that the structure is not critical and can vary enormously - hence varied shapes in Chan. One of ordinary skill in the art would not have turned to Chan or other water-insoluble prior art to modify the package shape or sealing mechanism of Ciallella, as it would be unlikely to have a solution for weak packaging material.

Even if they are combined so that the sealing mechanism of Chan *is* used with the arrangement of Ciallella, this would still not have resulted in the invention *without further modification.* This is because the seal of the allegedly relevant figures of Chan, is *not continuous* as defined in claim 1. Indeed, Chan only works with a non-continuous seal which must have a gap/break to provide

the self-closing flat channel valve - a completely different feature to our package which releases its contents by dissolution so must be continuous. Also, the shape of the Chan package in figs 1-4 is not the same as applicants' -it has an extending portion where the flat channel valve is. So, in order to get to applicants' invention by combining: one of ordinary skill in the art would have had to start with Ciallella, then add the thermoforming mechanism of Chan and *some* of the shape (i.e. the bit without the flat channel valve), and then add a second step by making the seal continuous. It is not seen how a combination of the documents would have resulted in applicants' invention.

Applicants' specification contains ample evidence of the criticality of the dome shape, combined with thermoforming process. This combination of thermoforming with dome shape is not taught by the Ciallella/Chan references, either alone or combined. See applicants' examples showing impact resistance and impact survival in the package were greatly improved when the critical selection of a dome shape in combination with thermoforming was made by applicants, (pages 11 - 14 of the specification).

In light of the above remarks, it is respectfully requested that the rejection over Ciallella in view of Chan be reconsidered and withdrawn and the application be allowed to issue.

Applicants respectfully request the Examiner's acknowledgement of the consideration of documents submitted with:

- **Information Disclosure Statement mailed on May 30, 2000;**
- **Supplemental Disclosure Statement mailed on June 8, 2000;**
- **Second Supplemental Disclosure Statement submitted on September 12, 2000.**

If a telephone conversation would be of assistance in advancing the prosecution of the present application, applicants' undersigned attorney invites the Examiner to telephone at the number provided.

Respectfully submitted,

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